

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,) Criminal No.
) 04-10098-WGY
v.)
)
MANUEL L. MENDES, CHRISTOPHER)
T. CUSTER, CARMEN FIGUEROA,)
DESIREE ALVES, WILLIAM TEJEDA,)
and JENNIFER PAVAO,)
)
Defendants.)

UNITED STATES' MOTION FOR EXTENSION
OF TIME TO FILE ITS RESPONSES TO
DEFENDANTS' MOTIONS TO SUPPRESS

The United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves the Court for an order extending the time in which to respond to the various motions to suppress filed by the defendants. The government seeks an additional two week period, until April 14, 2005, in which to file its response.

The grounds for this motion are that on or about March 17, 2005, defendants William Tejeda ("Tejeda"), Christopher Custer ("Custer") and Carmen Figueroa ("Figueroa") each filed several motions, in which the other defendants have joined. Undersigned counsel has been unable to devote adequate time to respond to the motions for the reason that she was in the midst of preparing for a trial which was scheduled to begin on March 28, 2005 (United States v. John Pizzarella, Criminal No. 03-10140-RWZ). Since that time, she had been involved in preparing a complex

sentencing memorandum and other materials in the case of United States v. George Upton, Criminal No. 02-10243-PBS, and in handling a wiretap investigation. Because of this, the undersigned has been unable to prepare and file the government's opposition to the parties respective motions.

WHEREFORE, the government requests that its motion be granted.

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Susan M. Poswistilo
SUSAN M. POSWISTILO
Assistant U.S. Attorney